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May 26, 2020

**VIA ECF**

Hon. George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, New York 10007

USDC SDNY  
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JUN 01 2020  
SO ORDERED:  
*George B. Daniels*  
George B. Daniels, U.S.D.J.  
Dated: JUN 01 2020

**Re: *Recarte et al v. Twenty-Three-One-Nought-W, LLC et al***  
**1:18-cv-08534-GBD**  
**Request to Adjourn Conference**

Dear Judge Daniels:

This firm represents the Defendants in the above-referenced action. Pursuant to Paragraph II(C) of Your Honor's Individual Practices, Defendants write on behalf of all parties to provide a status report and request that the status conference currently scheduled for Tuesday, June 2, 2020, be adjourned for 35 days until Tuesday, July 7, 2020, or another time that is convenient for the Court.

The parties have been working amicably to complete discovery. Party depositions have been completed. There are no disputes requiring judicial intervention at this time. Because this is a wage case where plaintiff's hours worked are vigorously disputed by the parties, the parties anticipate that several non-party depositions will be necessary. These depositions could not be scheduled due to the difficulties caused by the global COVID-19 pandemic, which is the reason for this 35-day adjournment request. No other scheduled dates will be affected by an adjournment.

Thank you for Your Honor's consideration.

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP  
*Attorneys for the Defendants*

By: \_\_\_\_\_

*Arthur J. Robb*

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Ian-Paul A. Poulos

cc: All Counsel of Record